

Exhibit 11

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CIVIL DIVISION

DEVIN FILIPPELLI as
Personal Representative of the
ESTATE OF KRYSTAL TALAVERA,
on behalf of the Estate and her Survivors,

CASE NO.: 9:22-cv81731

Plaintiff,

v.

GROW, LLC (d/b/a KD INCORPORATED
and THE KRATOM DISTRO); and SEAN
MICHAEL HARDER, individually.

Defendants.

_____ /

DECLARATION OF DEVIN FILIPPELLI

I, Devin Filippelli, state the following in support of Plaintiff's Motion for Entry of Final Default Judgment:

1. My name is Devin Filippelli, and I am the eldest son of Krystal Talavera.

2. My mom's passing was the absolute worst thing that my family and I experienced.

3. I was 18 and getting ready to move away to college in two short months. We had a plan in place for her to pay my living expenses so that I would be able to maintain focus on my schooling.

4. This was mainly possible due to the new job she had gotten just a couple of months prior. My mom had worked her way up the ladder as a nurse, to make the level of income to be able to do things like that for my brothers and me.

5. On June 20, 2021, all those plans were put on hold. I got a call saying she was in the hospital and it “didn’t look good.”

6. I still had no idea what was going on, but the last thing I was expecting the day after my high school graduation was a phone call like that one.

7. In the coming days, I had to plan a funeral, visit cemeteries, talk to investigators, etc. All while trying to find time to pack my things and move across the state to a new city where I knew almost nobody.

8. The amount of mental taxation those few weeks took on me were unimaginable. Not to mention, trying to assure my younger brothers that everything was going to be okay, while not even believing that statement myself.

9. I moved to college, where I had absolutely zero financial assistance, and got a job the first day I was there to ensure I could pay for rent, classes, textbooks, and all the costs associated with living alone.

10. I was working 50+ hours per week most weeks and, naturally, my performance in school started to slip. After just a semester in college, I had no

choice but to move in with my dad due to being unable to keep up with the load I had to take on.

11. If my mom was still here, I wouldn't have had to move. I would still be living the college experience with the people I met there. I would be a Junior in college about to graduate, and my younger brothers would have gotten to spend more time with her.

12. Instead, all of that was ripped away from not just us, but our entire family.

13. My mom was the nucleus of our family. She was the one who brought everyone together. She hosted Thanksgiving and Christmas every year.

14. For all of that to be gone in just an instant has had a devastating impact on all of us, and will continue to do so for the rest of our lives.

I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS MADE FOR USE AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY FOR PERJURY.

Executed: April 6, 2023

DocuSigned by:
Devin J Filippelli
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Devin Filippelli